

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X  
HACHETTE BOOK GROUP, INC.,  
HARPERCOLLINS PUBLISHERS LLC, JOHN  
WILEY & SONS, INC., and PENGUIN RANDOM  
HOUSE LLC,

Plaintiffs,

-against-

INTERNET ARCHIVE and DOES 1 through 5,  
inclusive,

Defendants.  
----- X

:  
: Index No. 1:20-CV-04160-JGK  
:  
:  
:  
:  
: **DECLARATION OF**  
: **BREWSTER KAHLE**  
: **REGARDING INTERNET**  
: **ARCHIVE’S COMPLIANCE**  
: **WITH PERMANENT**  
: **INJUNCTION**  
:

I, Brewster Kahle, declare as follows:

1. I make this declaration from personal knowledge and, if called to testify, I could and would testify competently thereto.
2. I founded the Internet Archive in 1996. I currently serve as the Internet Archive’s Digital Librarian and Chair of the organization’s Board of Directors. In my role, I oversee the Internet Archive’s digital lending library.
3. I am familiar with the Consent Judgment and Permanent Injunction Subject to Reservation of Right of Appeal in this matter (Dkt. No. 215) (“Permanent Injunction”), approved and ordered by Judge Koeltl on August 11, 2023.
4. As of the date of this declaration, the Internet Archive is in compliance with all of its obligations under the Permanent Injunction.

I declare under penalty of perjury of the laws of the United States of America that the statements above are true to the best of my knowledge, information and belief.

Executed this 11th day of September, 2023 at San Francisco, California.

DocuSigned by:  
*Brewster Kahle*  
D9A62F007760463...

---